

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO

JEREMY STANFIELD, on behalf of)
himself and all others)
similarly situated,)
)
Plaintiff,)
)
vs.) Case No. 3:20-cv-
) 07000-WHA
TAWKIFY, INC., et al.; and)
DOES 1-25,)
)
Defendants.)
_____)

REMOTE VIDEOTAPED DEPOSITION OF JEREMY STANFIELD

WEDNESDAY, MAY 26, 2021, 10:01 A.M.

MURRIETA, CALIFORNIA

REPORTED BY:
Tami L. Le
CSR No. 8716, RPR

Job No. 60670

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1 **A Yes.**

2 **Q Did you -- between the time when you first**
3 **clicked on the Tawkify ad and when you ultimately**
4 **made the purchase, did you have any reservations**
5 **with going forward with the matchmaking service?**

6 **A I mean, yeah. Like I said, I wanted to**
7 **think about it over the weekend. And they -- they**
8 **also mentioned -- I mean, even when I -- even when I**
9 **paid it, to me, it wasn't a full, like, commitment**
10 **because they said I had to go through some type of**
11 **screening or approval process after I paid. So, you**
12 **know, even paying didn't seem like it was, like,**
13 **concrete at that point.**

14 **Q In your mind, it was concrete once you were**
15 **accepted as a client by Tawkify?**

16 **A Right.**

17 **Q Okay. Did you -- strike that.**

18 **Did anyone at Tawkify tell you that, you**
19 **know, before the official client acceptance process,**
20 **that you could get a full refund?**

21 **A That I could get a full refund?**

22 **Q Yeah, of what you just said, the 3700.**

23 **A I mean, if I wasn't -- like, if I'm going**
24 **through another process whether I could go, like,**
25 **full, like, get accepted or not, then, to me, if I'm**

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1 not accepted, then I would get a full refund. So, I
2 mean, to me that -- like, nothing's concrete until I
3 get approved.

4 Q Right. I understand that.

5 But specifically, my question was did
6 Tawkify tell you that? Did they tell you that
7 before --

8 (Simultaneous speaking.)

9 A Yeah, they said --

10 Q I'm sorry, Mr. Stanfield. I apologize. I
11 want to get it all out just for the record so it's
12 clear.

13 A Go ahead.

14 Q Did anyone at Tawkify tell you that before
15 you were ultimately accepted as a client, approved
16 as a client, that if you were not accepted as a
17 client, you would get a full refund of everything
18 you paid?

19 A Sure, yeah. I mean, why would they keep my
20 money if I wasn't accepted?

21 Q They told you that; right?

22 A I believe so, yes.

23 Q Okay. And do you recall about how long it
24 took for you to be formally approved as a Tawkify
25 client after you received that email on the 29th of

1 "And I'm not so sure about 70%.

2 We never used to do Zoom dates

3 except for distance or traffic."

4 You respond:

5 "Yes I'm good with that, but if

6 the video date doesn't turn into a

7 physical date, then it should count

8 as one of my 6."

9 It should not count as one of my 6; is that
10 correct?

11 **A Right.**

12 **Q** Okay.

13 "Well that's not what [REDACTED] told
14 me. She said" -- this is you
15 talking. "She said that most of my
16 dates will be zoom because 70% don't
17 want to do an in person date at
18 first. I clarified and she said it
19 counts if you do a zoom date (sic)
20 and she then doesn't want to do an
21 in person."

22 Now, did I read that correctly so far?

23 **A Yeah.**

24 **Q** Okay. Now, [REDACTED] responds to you and she
25 said:

1 "I see your point but the same
2 amount of work - screening and
3 vetting - is done by [REDACTED] whether
4 it's a Zoom or in-person date.

5 "Did she say that people aren't
6 wanting IP dates because of Covid?"
7 And you say:

8 "Well that's not what was
9 presented to me. You never
10 mentioned zoom dates and said we
11 would meet somewhere. I'm not good
12 with it."

13 Did I read that correctly, sir?

14 **A Yes.**

15 **Q** Okay. She says:

16 "You can" -- and she emphasizes
17 by using all caps CAN -- "meet
18 somewhere as long as your match is
19 okay with it. I did mention Zoom
20 dates. It's what we were doing for
21 months during Covid but now we (sic)
22 are officially giving people the
23 option to do either. I'm sorry that
24 wasn't made clear but it's kind of
25 moot because we are offering in

1 person dates now.

2 (As Read) "And [REDACTED] by the way,
3 is one of the most experienced
4 matchmakers on the team. You've got
5 a goodie!"

6 Did I read that correctly, sir?

7 **A Yes.**

8 Q Okay. "We specifically talked
9 about your company picking the
10 place and you setting it up" --
11 This is you speaking now?

12 **A Yeah.**

13 Q -- "and setting it up and we meet
14 there. There was no mention that
15 it might be a zoom date and then
16 that counts. You can't represent
17 yourself fully on the zoom call and
18 shouldn't count towards the 6. So
19 again if there is no budging on
20 that, then I want to cancel. This
21 isn't negotiable for me."

22 Did I read that correctly, sir?

23 **A Yes.**

24 Q Okay. She responds:

25 "You don't have to do Zoom

1 dates." She emphasized the "HAVE."
2 You don't have to do Zoom dates.
3 That's all I'm saying. Just do an
4 in-person date that [REDACTED] will set up
5 for you.

6 "And by the way, I'm not
7 yelling - just wanted to emphasize
8 the," quote, "have," close quote.
9 Smiley face.
10 Did I read that correctly, sir?

11 **A Yes.**

12 Q We'll pause there because I think that's
13 where that exchange ends.

14 So ultimately, you ended up not going on
15 these Zoom dates; correct?

16 **A Correct. But my concern of not being a**
17 **part of the 70 percent of the dating pool was still**
18 **there. She wouldn't address it, kept going in**
19 **circles. And I got tired of it. Like, she just**
20 **kept going in the same circle, not addressing the**
21 **70 percent part. And it's just -- you know, I**
22 **didn't like it and I still didn't like it, and she**
23 **never addressed it.**

24 So I didn't -- like, the very next day,
25 [REDACTED] called and said she had an in-person date. But

1 still, in my mind, I'm thinking I'm only getting
2 access to 30 percent of the dating pool. And, you
3 know, that's not fair. That's not good service.
4 It's misrepresentation, and it's not what was
5 presented to me.

6 Q But I want to walk you back for a second,
7 though, Mr. Stanfield, because you said that if not
8 going on an in-person date was off the
9 table -- strike that. Let me rephrase.

10 You ultimately told [REDACTED] that if you had to
11 do Zoom dates, essentially, then you were going to
12 cancel because it was nonnegotiable; is that fair?

13 A That was part of my issue. That was half
14 of it. The other half was not being a part of the
15 70 percent of the dating pool because [REDACTED] was clear
16 that every -- that out of everyone, 70 percent of
17 women wanted Zoom first.

18 Q I understand that.

19 But you then said, after having heard that
20 explanation, that it was not negotiable for you to
21 do Zoom, it had to be in person; correct?

22 A Yeah, that was me answering what she said.
23 But, again, my concern is still the same for the
24 70 percent. She never -- she never addressed it.
25 It was never addressed. So I never -- we never came

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1 to a conclusion on that -- on that -- on that point.

2 Q Okay. But even though you didn't come to a
3 conclusion on that point, you still decided to go on
4 a date after that; correct?

5 A I mean, I tried to cancel and they didn't
6 cancel. So, I mean, they -- they -- they kept going
7 in circles and circles on text. And then, you know,
8 they're telling me they have an in-person date. And
9 I did end up going on the date. I mean, that's
10 obvious. I can't dispute that.

11 But I still wasn't happy with it and I
12 wasn't comfortable because, you know, clearly by the
13 quality and the level of compatibility of the two
14 dates that I went on, it was clear it was from a
15 very small dating pool, and it was
16 misrepresentation.

17 Q Okay. Sir, I understand that, but I want
18 to direct you back to my question, which is here you
19 expressed your dissatisfaction with the fact that
20 some of the dates could be Zoom dates.

21 Is that accurate so far?

22 A I did express that and I expressed about
23 the 70 percent.

24 Q Correct.

25 A Those are two things that were equally

1 important to me. One of them was addressed and one
2 of them wasn't.

3 Q Okay. I understand that. But I want to
4 take it in steps to make sure the record is clear.

5 So two things were important to you. One
6 was no Zoom dates; that's correct?

7 A If it was going to count, yes. If it
8 wasn't going to count, I would be open to it. That
9 was clear.

10 Q Okay. So open to Zoom dates as long as it
11 doesn't count against the six dates that you paid
12 for --

13 A Yep.

14 Q -- the package that you paid for?

15 A Yep.

16 Q Okay. But then the second concern was
17 because, according to [REDACTED] approximately 70 percent
18 of the women were not comfortable doing in-person
19 because of COVID, you felt that the dating pool for
20 you was going to be restricted as a result?

21 A Correct.

22 Q Is that a fair representation?

23 A Correct.

24 Q Okay. So ultimately, you decided to move
25 forward with the dating service even though you knew

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1 that potentially 70 percent of the people in the
2 dating pool didn't want to do in-person because of
3 COVID?

4 MR. CONN: Hold on.

5 THE DEPONENT: What?

6 MR. CONN: Hold on. I want to think if
7 I --

8 MR. GRAHAM: Do you have an objection?

9 MR. CONN: I'm trying to decide if I have
10 an objection. No.

11 Jeremy, I apologize.

12 MR. GRAHAM: Let me pause for a second.

13 Court Reporter Tami, can you refresh
14 realtime? It's stalled on me for some reason.

15 Okay. So let me go back.

16 Q So, Mr. Stanfield, I just want to be clear.

17 So we resolved, at least in our discussion
18 here, the issue of Zoom versus in person, right,
19 meaning that you were not okay doing a Zoom date, it
20 had to be in person. If it's going to be Zoom, it
21 just can't count toward your six-date package.

22 Is that a fair representation?

23 A Right, yes.

24 Q Now, the 70 percent concern you had, I'm
25 going to paraphrase, and feel free to correct me, is

1 that because, according to [REDACTED] up to 70 percent
2 approximately of the dating pool women did not want
3 to go on in-person dates because of COVID, you felt
4 like you would have a reduced caliber or quality of
5 dates potentially because 30 percent -- you were
6 essentially subject to a 30 percent pool as opposed
7 to the full hundred percent pool?

8 A Correct.

9 Q Okay.

10 A Yes.

11 Q Okay. Thank you.

12 Now, having known that, in this back and
13 forth with [REDACTED] and [REDACTED], you still decided to go on
14 a date after that; correct?

15 A Yes.

16 Q Okay. And the date that you went on after
17 that, it was in person, it was not Zoom?

18 A Yes.

19 Q Meaning that it was in person; right?

20 A Yes, it was in person.

21 Q I just had to clarify that because I -- it
22 was my fault for mixing two questions in one.

23 A Sure.

24 Q Okay. So you mentioned a second ago that
25 you tried to cancel in this discussion, but I want

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1 to look at the text message so that we're -- we're
2 really clear.

3 So give me one second to pull up the
4 precise page where you mention cancelation here.

5 Here it goes. Can you see what's on my
6 screen right now, Mr. Stanfield?

7 **A Yes.**

8 Q Okay. So at the top of this page, and
9 we're still on the July 7th exchange, you say:

10 "We specifically talked about
11 your company picking the place and
12 setting it up and we meet there.
13 There was no mention that it might
14 be a zoom date and then that counts.
15 You can't represent yourself fully
16 on a zoom call and it shouldn't
17 count towards the 6. So again if
18 there is no budging on that, then I
19 want to cancel. This isn't
20 negotiable for me."

21 Did I read that accurately, sir?

22 **A Yes.**

23 Q Okay. You said if there was no budging on
24 that, you want to cancel; isn't that fair?

25 **A That's exactly what I said, yes.**

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1 Q Right. So you didn't say --

2 A Right there.

3 Q You didn't say "cancel my package now," did
4 you?

5 A I didn't say those exact words, that's
6 correct.

7 Q In fact, you didn't tell them "cancel my
8 package" in any way in that exchange, did you?

9 A I did tell them that I wanted to cancel
10 because I didn't like their policy and they
11 misrepresented to me.

12 Q I just want to direct you back to your
13 words, Mr. Stanfield. You said, "if there is no
14 budging on that, then I want to cancel."

15 A And there was other things I said too. You
16 can't just point to one thing and say that it's
17 binary. It's not. There's other concerns and I
18 wasn't happy with the 70 percent and they
19 misrepresented and I tried to cancel. So I mean --

20 MR. GRAHAM: Objection; nonresponsive.
21 Objection; nonresponsive.

22 Q Sir, I just want to direct you back to this
23 particular exchange. You'll have an opportunity to
24 talk about your other communications because there
25 are many others, and we'll talk about them all or at

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1 least a chunk of them.

2 A Sure.

3 Q But on this particular communication,
4 you're talking about canceling here. I want to
5 focus on this.

6 Okay. Here your cancelation request was
7 conditional, wasn't it?

8 A It was conditional and it involved other
9 paragraphs in that exchange. It was an entirety of
10 my concern with the 70 percent and the Zoom dates
11 counting.

12 So it's a package deal. It's not binary.
13 It's not one or the other. I did -- if you want to
14 point to this one paragraph, then, yes, it says
15 specifically "if you can't budge on the in-person
16 Zoom dates, then I want to cancel." But I still had
17 a concern that was never addressed about the
18 70 percent. It clearly shows that she didn't
19 address it. So to me, in my mind, so I can express
20 myself clearly to you, it's a whole-package deal. I
21 wasn't comfortable with it and my concern was never
22 addressed.

23 Q Okay. Are you done? I don't want to
24 interrupt your answer. Are you done answering, sir?

25 A I'm done.

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1 Q Okay. So understand all that.

2 But they did budge here, didn't they? They
3 did in person as opposed to Zoom?

4 A But they also only picked from 30 percent
5 of the dating pool.

6 Q Sir, it's a "yes" or "no." Did they budge
7 here, "yes" or "no"?

8 A Did they budge?

9 Q Yeah.

10 A Budge? What do you mean, did they budge?
11 I don't understand your question.

12 Q Sir, I'm just referring back to your
13 language. You said, "So again if there's no budging
14 on that," meaning Zoom dates are going to count
15 as --

16 (Simultaneous speaking.)

17 A On that specific --

18 Q Sir, I'm not done. Sorry, sir.

19 A Go ahead.

20 Q Can't talk over each other.

21 A No problem.

22 Q "So again if there's no budging on
23 that, then I want to cancel."

24 My question is they did budge on that; you
25 were not given a Zoom date to count as one of your

1 six dates, were you?

2 A They -- it was an in-person date, but it
3 was still part of the smaller dating pool. So it
4 still -- they still didn't address my concern and
5 they still took that in-person date from 30 percent,
6 according to [REDACTED], 30 percent of the dating pool,
7 which is a misrepresentation to me.

8 MR. GRAHAM: Objection; nonresponsive.

9 Q Sir, I just want to be clear here because
10 this is an important point. All right? So --
11 because ultimately, you would agree with me that
12 Tawkify can't force a woman to go on an in-person
13 date if she's uncomfortable because of COVID? You
14 agree with that; right?

15 A Yes, I agree with that.

16 Q Because Tawkify can't force you to go on an
17 in-person date if you're uncomfortable with that;
18 right?

19 A I agree.

20 Q Just like Tawkify couldn't force you to go
21 on a Zoom date if you were uncomfortable doing it;
22 right?

23 A Yes.

24 Q Okay. So ultimately, it's up to the people
25 in the dating market to decide what they're

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1 comfortable with; isn't that a fair statement?

2 A Right. And that should have been presented
3 before I spent my money. It wasn't.

4 Q Sir, but my question simply is they can't
5 force you to do it, can they?

6 A No, they cannot.

7 Q Okay. So at this point in the conversation
8 where you're telling them "if you don't budge on
9 charging me a date for a Zoom date as opposed to an
10 in-person date, then I want to cancel," they then
11 budged on it? They said, "Okay, well, here's an
12 in-person date." They didn't give you a Zoom date
13 after that, did they?

14 A I don't consider that budging when they
15 told me that I could have an in-person date, but it
16 would be from a small percentage of the dating pool.
17 It wasn't -- like, again, it's not binary. I'm not
18 sure why we have to keep going in circles about
19 this. But they told me there's an opportunity for
20 an in-person date. It's not like they said there
21 was -- no one's doing Zoom dates -- or no one's
22 doing in-person, it's a hundred percent Zoom dates
23 and they had to budge on an in-person. There was an
24 option for in-person, but it's only 30 percent of
25 the dating pool. So it's not a -- the true budging

1 is not -- still not taking care of all my concerns
2 with their service and their misrepresentation. My
3 concern was never addressed.

4 So, like, I'm not sure what you're trying
5 to get to, but I'm going to keep responding this
6 way.

7 Q Sir, you can respond however you want. We
8 have a court reporter here to record your answer.
9 That's the whole point, is to do a question and
10 answer. So my question --

11 A Sounds good.

12 Q -- coming back to the issue that we're
13 discussing here is --

14 A Sure.

15 Q -- ultimately, you decided, knowing that,
16 according to [REDACTED], that 30 percent of people here
17 were okay doing in-person and 70 percent were not,
18 you still decided to go on an in-person date, didn't
19 you?

20 A I did.

21 Q You could have told her, "You know what,
22 given what you told me about the approximate
23 70 percent, no more dates, no more budging,
24 nothing's negotiable, I want to stop right now and I
25 don't want to go on an in-person date because it's

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1 only 30 percent pool now."

2 You could have said that, couldn't you?

3 **A I could have.**

4 Q But you did not say that, did you?

5 **A Because no one addressed my concern, so --**

6 Q That's a "yes" or "no" question, sir.

7 **A I could have said that. I did not say it.**

8 Q Okay. All right. We can move.

9 Okay. So I want to now turn to what
10 happened after that. So let's talk about that first
11 date.

12 So what was the name of your first date?

13 **A I don't remember.**

14 Q Do you remember the day that you went on
15 it, the date -- like, what day of the month you went
16 on that date?

17 **A I don't.**

18 Q Would it refresh your recollection if you
19 saw, like, communications that you had about the
20 date as to when it happened?

21 **A If it shows the date, then, yeah, I**
22 **probably would be able to recall it.**

23 Q Okay. Give me one moment, sir.

24 Okay. So we're going to stay in Exhibit 5,
25 and then -- actually, one second. Strike that.

1 (As Read) "He makes between 200k
2 and 400k a year and lives in a nice
3 house."

4 Did I read that accurately so far?

5 A Yes.

6 Q Okay. And is that what you told [REDACTED] that
7 you made between 200 and 400K a year and live in a
8 nice house?

9 A Yes.

10 Q Okay. Was that true?

11 A Yeah, it was pretty close. I was right
12 around -- you know, I was at Power at the time, so
13 it was pretty close to 200.

14 Q Earlier today, sir, you testified that you
15 made about \$150,000 a year at Power. So was it
16 150,000 or was it closer to 2-?

17 A I mean, it's a range. Some -- I think last
18 year, I made more than what I'm making so far this
19 year. So it was -- last year was higher than this
20 year, so maybe that's why there's a discrepancy.

21 Q Were you making 400K a year?

22 A No, but I was right around 200.

23 Q Okay.

24 A I don't know -- I don't know why she gave a
25 range of 2- and 4-. But, I mean, I'm pretty sure I

1 told her around 2-. These are her notes, not mine.

2 Q Right. That's why I asked if you had
3 mentioned this to her. A second ago, you mentioned
4 that you did, so I just wanted to clarify.

5 A Sure.

6 Q Okay.

7 A Okay.

8 Q So then you say -- then she says -- strike
9 that. She says, this is [REDACTED] speaking:

10 (As Read) "Her income doesn't
11 really matter so much as what she
12 does with her time. Shouldn't be
13 living off her parents or someone
14 else. No one with Trust Fund money
15 who wastes time all day. No one
16 into reality TV, soap operas or
17 drama. Someone doing something. He
18 feels he is always getting better
19 and learning and growing and open to
20 new perspectives and opinions.
21 Politics -- he considers himself an
22 independent -- no one far left or
23 far right. Not into someone with
24 extremes."
25 Let me stop there for a second. What I

1 just talked about since the last question, are these
2 sorts of descriptors accurate in terms of what you
3 told [REDACTED] you were interested in?

4 **A Yes.**

5 Q Okay. "Doesn't want someone who
6 feels they have to think like she
7 does. Not seeing another child but
8 open to it. Also would be happy to
9 get vasectomy. Has the money and
10 time. Bulk of time is spent
11 working and with daughter. He is
12 used to driving to do his solar
13 work. He likes to dance and dances
14 a lot of different styles."

15 Let me stop there for a second. Of the
16 things I just described since the last question, are
17 these fairly accurate in terms of what you told
18 [REDACTED]?

19 **A I wasn't open to another child.**

20 Q Okay. So you --

21 **A That part's not really accurate.**

22 Q Okay. Thank you for that.

23 So you never told anyone at Tawkify that
24 you were open to having kids, any more kids?

25 **A I don't recall saying that. I mean, I**

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1 So I was just trying to get some kind of
2 response to -- to get them to do something because I
3 wasn't getting anywhere, just the constant emails
4 and text messaging, I wasn't getting any resolution.
5 So I just -- I -- I stated that to -- to put some
6 teeth into what I was saying, but I didn't have an
7 attorney at that point.

8 Q So you lied to Tawkify?

9 A On that particular sentence, yes.

10 Q So you misrepresented the facts to Tawkify?

11 A I -- I did not have an attorney, if that's
12 your question.

13 Q Did you misrepresent the fact that you
14 spoke to your attorney this morning and he suggested
15 that you offer what you said there to Tawkify?

16 MR. CONN: Objection; asked and answered.

17 Q BY MR. GRAHAM: You can still answer, sir.
18 Did you misrepresent the facts there, "yes" or "no"?

19 A Yes.

20 MR. GRAHAM: Okay. All right. We'll pull
21 this document down.

22 All right. What number are we at?

23 THE REPORTER: 14.

24 MR. GRAHAM: Marking as Exhibit 14 a
25 document that's Bates-labeled STANFIELD000038. One

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1 **A They ignored 99 percent of my preferences.**

2 Q I'm going to ask -- "yes" or "no," sir --
3 is it --

4 **A It's not a "yes" or "no" question -- it's**
5 **not a "yes" or "no" answer.**

6 Q It actually is.

7 **A It's not binary.**

8 Q It actually is. When you say --
9 (Simultaneous speaking.)

10 Q This is the question, sir: When you say
11 they completely ignored your preferences, is that an
12 accurate statement or is that an inaccurate
13 statement?

14 **A Completely ignored my preferences, I guess**
15 **in that one aspect, then it's not accurate.**

16 MR. CONN: Hey, Priscilla, I'm having
17 trouble downloading about half of these. At the end
18 when you send everything to the court reporter,
19 would you mind sending them to me as well?

20 MS. SZETO: I'll copy you.

21 MR. CONN: Cool. Thanks.

22 MS. SZETO: Uh-huh.

23 Q BY MR. GRAHAM: I want to go back to
24 Exhibit 2, which has already been entered. Let me
25 pull it back up for you, Mr. Stanfield.

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1 A Yeah. Actually, the -- the first time it
2 was offered to me, that language wasn't used, but it
3 was used here on July 22nd, that is correct.

4 Q Okay. Now, you're in sales; right,
5 Mr. Stanfield?

6 A Yes, I'm in sales.

7 Q And you've been doing that for about nine
8 years for several employers?

9 A Sure, yes.

10 Q The concept of something being
11 nonrefundable is very understandable to you;
12 correct?

13 A It -- yes, it is.

14 Q Okay. If Tawkify tells you that they're
15 willing to give you another match but it's
16 nonrefundable, did you interpret that as meaning
17 that you would get a full cash refund for that
18 match?

19 A So, again, the -- when they first offered
20 me a credit for a match, those words weren't used.
21 That was only after I was convinced to go on a
22 second date that was also bad that they -- on that
23 interaction there that you're showing me, they use
24 that language. But when it was first said to me,
25 the words "nonrefundable" were not used. I wouldn't

1 have asked for a full refund if that was, you know,
2 the case. They clearly admitted that it was not
3 good service and a bad -- bad match and shouldn't be
4 counted, and that goes for both of them.

5 But as far as this particular thing, it's
6 crystal clear that they're using the words
7 "nonrefundable." It's in writing. I mean...

8 Q Did anyone at Tawkify ever tell you when
9 they credit a match back to your account that that
10 means that you get a full refund for that match if
11 you decide not to go forward with Tawkify services?

12 A Did anyone -- the conversation with [REDACTED] --
13 I believe her name was [REDACTED] -- she said that I
14 shouldn't have got that match and that I will get a
15 full credit for that match. She didn't mention
16 anything about refunds. We didn't even talk about
17 refunds at that point, but she did say that I would
18 get credit, but she didn't say it was nonrefundable
19 or doesn't -- you know, as far as I'm concerned, if
20 she's going to give me a credit, I should have
21 canceled right then and gotten a full refund because
22 she had already admitted that she was giving me a
23 credit. She didn't say it was a nonrefundable
24 credit, but -- those words were never used at that
25 time.

JEREMY STANFIELD

May 26, 2021

1 DEPOSITION OFFICER'S CERTIFICATE

2

3 STATE OF CALIFORNIA)
4 COUNTY OF ORANGE) ss.
5)
6)

7

8 I, TAMI L. LE, hereby certify:

9 I am a duly qualified Certified Shorthand
10 Reporter in the State of California, holder of
11 Certificate Number CSR 8716 issued by the Court
12 Reporters Board of California and which is in full
13 force and effect. (Fed. R. Civ. P. 28(a)).

14 I am authorized to administer oaths or
15 affirmations pursuant to California Code of Civil
16 Procedure, Section 2093(b), and prior to being
17 examined, the deponent was first duly sworn by me.
18 (Fed. R. Civ. P. 28(a), 30(f)(1)).

19 I am not a relative or employee or attorney
20 counsel of any of the parties, nor am I a relative
21 or employee of such attorney or counsel, nor am I
22 financially interested in this action. (Fed. R.
23 Civ. 28).

24 I am the deposition officer that
25 stenographically recorded the testimony in the
foregoing deposition and the foregoing transcript is

JEREMY STANFIELD

May 26, 2021

1 a true record of the testimony given by the witness.
2 (Fed. R. Civ. P. 30(f)(1)).

3 Before completion of the deposition, a review
4 of the transcript [x] was [] was not requested.
5 If requested, any changes made by the deponent (and
6 provided to the reporter) during the period allowed,
7 are appended hereto. (Fed. R. Civ. P. 30(e)).
8

9 Dated: May 28, 2021.

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TAMI L. LE

Certified Shorthand Reporter No. 8716, RPR